



Department of
Toxic Substances
Control

*Preventing
environmental
damage from
hazardous waste,
and restoring
contaminated
sites for all
Californians.*



State of California



California
Environmental
Protection Agency

Fact Sheet, June 2006

Special Schools Cleanup Guidance

Dealing with Lead-Based Paint, Termiticides, and Electrical Transformers at Proposed New or Expanding School Sites

This fact sheet describes new guidance the Department of Toxic Substances Control (DTSC) has developed for dealing with lead-based paint, organochlorine pesticides from termiticides, and polychlorinated biphenyls from electrical transformers. The new guidance provides a uniform and streamlined approach for initial assessment of proposed school sites where these are recognized environmental conditions. If these are the only recognized environmental conditions for a residential or commercial site, evaluation of these contaminants may be submitted in a Phase I Environmental Site Assessment or Addendum.

This guidance provides recommended:

- sampling strategies
- sample analyses
- health screening criteria

These recommended strategies can be integrated into the environmental review process for schools to ensure protection of children, staff, community, and the environment from potential health effects of exposure to these contaminants.

The guidance is intended to be used by school districts, county offices of education, the California Department of Education, and charter schools using State funding for acquisition or construction of proposed new or expanding school sites.

Where to find the new guidance

You can find the new guidance on DTSC's Web site, www.dtsc.ca.gov.

Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers
June 9, 2006

This guidance supersedes the DTSC *Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed School Sites*, dated July 23, 2001. Mitigation, management, and removal of asbestos-containing material (ACM) is subject to extensive federal, state, and local requirements. As a result, DTSC will no longer provide guidance specifically for ACM found in buildings and structures. However, DTSC will continue to address naturally-occurring asbestos separately through the "Interim Guidance, Naturally Occurring Asbestos (NOA) at School Sites" and "Draft Operations and Maintenance Plan Template for Naturally Occurring Asbestos Response Actions at Schools."



Why use this guidance?

This guidance provides technical recommendations to evaluate the presence and potential health effects of lead, organochlorine pesticides, and polychlorinated biphenyls from specific sources. It is intended to improve and expedite the environmental review process for schools by providing recommended sampling strategies, sample analyses, and health screening criteria based on DTSC's expertise and experience.

When to use this guidance

Use this guidance to evaluate a proposed school site at which you suspect any of these contaminants:

Lead from lead-based paint - Residences constructed before January 1, 1979, schools constructed before January 1, 1993, and any commercial or industrial structures.

Organochlorine pesticides from termiticide application - Wooden structures constructed prior to January 1, 1989.

Polychlorinated biphenyls from electrical transformers - Transformers installed before January 1, 1979.

How to use this guidance

The guidance should be integrated into one of the following:

- Phase I Environmental Site Assessment (Phase I) or Phase I Addendum
- Preliminary Environmental Assessment (PEA) or Supplemental Site Investigation (SSI).

Phase I or Phase I Addendum

Evaluation of lead from lead-based paint, organochlorine pesticides from termiticides, or polychlorinated biphenyls from electrical transformers may be submitted in a Phase I or Phase I Addendum if all of the following conditions apply to your school site:

- ✓ The site is a residential or commercial property.
- ✓ Lead, organochlorine pesticides, or polychlorinated biphenyls from the specific sources are the only recognized environmental conditions for the site.
- ✓ The environmental review process for the site has not reached a PEA.

DTSC is developing a proposed amendment to the Phase I regulations (Cal. Code Regs., tit. 22, div. 4.5, ch. 51.5, commencing with § 69100). This amendment allows limited soil sampling data for organochlorine pesticides from termiticides to be submitted along with lead and polychlorinated biphenyls for sites where these are the only recognized environmental conditions. Until the amendment is adopted, you may submit sampling results for organochlorine pesticides used as termiticides in a Phase I or Phase I Addendum as described above.

If you include the sampling results in a Phase I or Phase I Addendum, you do not need to submit a work plan for DTSC review and approval if you follow the strategies described in the guidance. However, DTSC is available to help you develop a site-specific sampling strategy using the guidance before you collect your samples. Also, consult DTSC if your site is not addressed by this guidance or if you wish to use a different strategy.

PEA or SSI

You may incorporate this guidance into a PEA or SSI if lead, organochlorine pesticides, and polychlorinated biphenyls from specific sources as described previously are just some of the recognized environmental conditions identified for the site. Sampling for all potential contaminants should be discussed during a scoping meeting and included in a work plan that is submitted to DTSC for review and approval. The results should be submitted in a PEA or SSI Report.

For more information

Please contact DTSC if you have questions about applying this guidance to your site. Also, contact DTSC if you would like to consider alternative strategies for your site.

If you have an agreement (Environmental Oversight Agreement, School Cleanup Agreement, or Voluntary Cleanup Agreement) or an assigned DTSC project manager for your site, please contact the assigned DTSC project manager or Unit Chief.

For general questions about this guidance contact:

Triss Chesney at (714) 484-5447 or tchesney@dtsc.ca.gov